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8                   UNITED STATES DISTRICT COURT  
9                   WESTERN DISTRICT OF WASHINGTON  
10                  AT SEATTLE

11 OCEAN SERVICES, LLC, a Washington  
12 limited liability company,

13                   Plaintiff,

14                  v.  
15 OMNI2MAX, INC., a California Corporation

16                  Defendant.

11                  NO. 2:22-cv-01058-JHC

12                  STIPULATION AND ORDER TO  
13                  EXTEND DEADLINE TO FILE  
14                  DISMISSAL PAPERWORK

17 OMNI2MAX, INC., a California Corporation,

18                  Counterclaimant/Third-Party Plaintiff,

19                  v.

20 OCEAN SERVICES, LLC, a Washington  
21 limited liability company,

22                  Counter-defendant,

23 STABBERT MARITIME, LLC, a  
24 Washington limited liability company,  
25 OCEAN GUARDIAN HOLDING, LLC, a  
Washington limited liability company,

26                  Third-Party Defendants.

## **STIPULATION**

The parties, by and through their undersigned counsel of record, hereby stipulate, consent and agree as follows:

1. This case involves issues related to an ongoing contract.
  2. Although the parties have settled the issues related to the pending lawsuit, there has been an issue regarding the final settlement agreement and how it impacts performance of the contract moving forward.

3. The tentative settlement agreement included an arbitration clause to resolve these issues, and the parties may conduct arbitration to resolve these issues.

4. The parties request an additional sixty days to complete the final paperwork and, if necessary, conduct arbitration.

DATED: November 21, 2024. PROCOPIO, CORY, HARGREAVES & SAVITCH LLP

By: /s/ Edward C. Walton

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Defendant Ocean Services, LLC and  
Third-Party Defendants Stabbert  
Maritime, LLC and Ocean Guardian  
Holding, LLC

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**ORDER**  
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Having considered the parties' stipulation, the Court hereby orders that:

3. The parties shall have until January 22, 2025, to submit the closing paperwork.

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**IT IS SO ORDERED.**  
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6 Dated this 21st day of November, 2024.

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8 John H. Chun  
9 United States District Judge

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